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3 District of Arizona

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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF ARIZONA

14 United States of America,
15 Plaintiff,

16 v.

17 \$18,080.00 in United States Currency,
18 Defendant.

19 **VERIFIED COMPLAINT FOR
20 FORFEITURE *IN REM***

21 Plaintiff United States of America brings this complaint and alleges as follows in
22 accordance with Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules
23 for Admiralty or Maritime Claims and Asset Forfeiture Actions (“Supplemental Rules”):

24 **BASIS FOR FORFEITURE**

25 1. This is a civil action *in rem* to forfeit property pursuant to 21 U.S.C. §
26 881(a)(6) and 18 U.S.C. § 981(a)(1)(A) because it was furnished or intended to be
27 furnished by a person in exchange for a controlled substance or listed chemical in
28 violation of Title II of the Controlled Substances Act, 21 U.S.C. § 801, *et seq.*, is
proceeds traceable to such an exchange, or was used or intended to be used to facilitate a
violation of Title II of the Controlled Substances Act, 21 U.S.C. § 801, *et seq.*, or is
property involved in a money laundering transaction or attempted transaction.

1 2. This is a civil action *in rem* brought to forfeit property pursuant to 18
2 U.S.C. § 981(a)(1)(C) because it constitutes or is derived from proceeds traceable to a
3 violation of, among other things, a specified unlawful activity and 18 U.S.C. § 1952,
4 travel in interstate commerce to distribute the proceeds of, and promote or facilitate the
5 promotion of, an unlawful activity.

6 3. Venue and jurisdiction in Arizona are based upon 21 U.S.C. § 881(j) and
7 28 U.S.C. §§ 1355(b) and 1395 as acts and omissions occurred in the District of Arizona
8 that give rise to this forfeiture action. This Court has jurisdiction. 18 U.S.C. § 981(h)
9 and 28 U.S.C. §§ 1345 and 1355.

10 **DEFENDANT IN REM**

11 4. The Defendant consists of \$18,080.00 in United States currency
12 (“defendant currency”) seized on September 19, 2017, from Patrick O’Neal Ivory, Jr.
13 The defendant currency currently is in the custody of the Homeland Security
14 Investigations.

15 **INTRODUCTION**

16 5. The Arizona High Intensity Drug Trafficking Area (HIDTA) Border
17 Enforcement Security Task Force (BEST) has a HSI Phoenix Special Agent (SA)
18 assigned to the Phoenix Police Department (PPD) Commercial Narcotics Interdiction
19 Unit (CNIU) based out of the Phoenix Sky Harbor International Airport.

20 6. The HSI Phoenix SA works with the PPD Detectives at the CNIU during
21 their day-to-day interdiction operations as well as serving as the HSI Phoenix point of
22 contact for all passenger and cargo activities regarding the Phoenix Sky Harbor
23 International Airport.

24 7. Among other things, the HSI Phoenix SA assists detectives of the CNIU to
25 identify and interdict money couriers in an effort to disrupt Drug Trafficking
26 Organizations (DTOs). Based upon experience of CNIU investigators and investigations
27 across the country, it is common knowledge that cities in the mid-west and east coast are
28 known demand locations for illicit drugs. States such as Arizona and California are

1 considered source locations due to their close proximity to the border of Mexico and
2 established drug transportation routes. Person(s) involved in the illegal drug trade, often
3 hire couriers to transport drugs and or proceeds from the sale of drugs by utilizing
4 commercial airlines and shipping companies. In an effort to identify and disrupt
5 potential drug and/or money couriers related to drug organizations and criminal
6 syndicates, investigators utilize a variety of resources, including confidential informants,
7 suspicious flight itineraries, other law enforcement agencies, and prior knowledge of
8 criminal activity or intelligence.

9 8. Factors that constitute suspicious flight itineraries include, airfare purchase
10 at the counter immediately prior to departure or short notice reservations for a one-way
11 travel, sometimes paid in cash. In addition, it is common for couriers to utilize a third
12 party credit card to purchase airfare and to provide inaccurate or not in-service telephone
13 numbers to the airlines. Couriers travel with minimal or no luggage and will often
14 attempt to board the aircraft at the last possible moment. Drug and/or money couriers
15 utilize these techniques in an attempt to conceal their identities from law enforcement
16 authorities and minimize their exposure to commercial airlines.

17 **BACKGROUND**

18 9. On September 18, 2017, while on duty at the CNIU located at the Phoenix
19 Sky Harbor International Airport, HSI Special Agent Brian Derryberry (SA Derryberry)
20 received information from the HSI Houston concerning an individual identified as
21 Patrick O'Neal Ivory, Jr. (IVORY) who was in possession of approximately \$10,000 in
22 U. S. currency discovered by Houston Transportation Security Administration (TSA).

23 10. The TSA Agents in Houston contacted IVORY during the passenger
24 screening and observed IVORY pull out several rubber-banded bundles of currency in
25 his possession from his pants pockets.

26 11. IVORY stated that he had "\$10,000 but the amount could be more."
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1 12. IVORY claimed he was traveling to Los Angeles for his birthday and to go
2 shopping.

3 13. TSA provided a physical description to SA Derryberry for IVORY and
4 advised the currency was inside IVORY's pockets.

5 14. Prior to the arrival of the flight in Phoenix, investigators ran a criminal
6 history check on IVORY.

7 15. A check of federal, state and local law enforcement indices revealed
8 IVORY had previous charges on possession of marijuana.

9 16. SA Derryberry contacted the CNIU PPD Sergeant who was able to make
10 arrangements for additional CNIU members to assist with identifying IVORY upon his
11 arrival.

12 17. IVORY purchased his one-way ticket within 48 hours of the flight and had
13 no checked luggage.

14 18. Based on the information received and their knowledge of the drug
15 demand/source relationship between Houston and the southwest states, investigators
16 decided to attempt to talk with IVORY.

17 19. IVORY was traveling on American Airlines flight #531 from Houston to
18 Los Angeles, California, with a stop in Phoenix, Arizona.

19 20. Investigators approached the arrival gate and observed a male, consistent
20 with an individual fitting IVORY's description, in the terminal talking on his cellular
21 phone.

22 **Investigators' Contact with IVORY**

23 21. Investigators approached the male passenger believed to be IVORY,
24 identified themselves, and showed him their official badges and credentials.

25 22. Investigators asked the individual if they could speak to him, and he
26 agreed.

1 23. The individual ended his phone call and provided investigators with his
2 boarding pass and Texas identification card in the name of Patrick O'Neal Ivory, Jr.

3 24. Investigators explained to IVORY the purpose of their contact and
4 explained they received information from the Houston TSA that he was in possession of
5 a large amount of currency.

6 25. Investigators inquired about IVORY's ticket purchase and his intended use
7 of the currency.

8 26. IVORY stated he was traveling from Houston, Texas, to Los Angeles to
9 shop for his birthday.

10 27. IVORY showed investigators his Texas identification and pointed out his
11 birthday was in several days, September 22, 1993.

12 28. IVORY advised he had only one carry-on bag and denied traveling with
13 illicit drugs or contraband.

14 29. IVORY stated he had a little over \$10,000.

15 30. When investigators asked for the specific amount, IVORY then stated he
16 had \$12,000.

17 31. IVORY showed investigators several rubber-banded bundles of currency,
18 which IVORY had pulled out from his pants pocket.

19 32. Investigators asked IVORY how he obtained the currency. IVORY
20 responded he designed and sold clothes through his clothing line.

21 33. IVORY stated he intended on spending the currency on clothes for his
22 birthday.

23 34. IVORY could not provide anything to corroborate how he obtained the
24 currency.

25 35. IVORY did not have a wallet, driver's license, business card or any credit
26 cards.

27 36. Although IVORY claimed he obtained the currency from selling clothes he
28 designed, he did not have a bank account, personal or business.

1 37. IVORY stated he “does everything” through his mother, Cheryl Herron’s
2 (Herron) account.

3 38. IVORY told investigators his mother gave him at least \$5,000 to spend
4 and purchased his airline ticket because his birthday was coming up.

5 39. Based on the information received, investigators told IVORY they wanted
6 to conduct a verification count of the currency as the amount he claimed to possess had
7 changed several times.

8 40. Investigators advised IVORY they had more questions regarding the
9 currency as IVORY initially claimed he had “around \$10,000” and then claimed he had
10 \$12,000.

11 41. Investigators asked IVORY if they could continue the contact inside the
12 CNIU office to conduct the count and have a narcotic canine examine the currency.
13 IVORY agreed and carried his own bag.

14 42. IVORY denied the currency had been exposed to illicit drugs.

15 43. While walking to the CNIU office, IVORY showed investigators an
16 Instagram account for his clothing line and said Herron’s account was part of the
17 company and handled all his money.

18 44. IVORY inquired about the ticket tip information, and investigators
19 explained it varied in reasons from last minute ticket purchases, departure/arrival cities
20 or how the ticket was purchased, and that in this instance, TSA notified CNIU.

21 45. While walking to the CNIU office, IVORY verified his personal
22 information, mailing address and phone number.

23 46. IVORY stated he lived with his mother, Cheryl Herron, and his sibling.

24 47. IVORY did not pay rent, but had child expenses for his one-year old son.

25 **IVORY’s Interview at CNIU Office**

26 48. Upon arrival at the CNIU office, IVORY was asked to place the contents
27 of his pockets on the table.

1 49. IVORY withdrew from his pants pockets three rubber-banded bundles of
2 currency, his Texas identification card, and a pre-paid debit card that IVORY stated he
3 purchased at the last minute because the airline charged him extra to board the flight,
4 although no explanation given as to why.

5 50. During a pat down, another rubber-banded bundle of currency was found
6 inside IVORY's sweater-hoodie pocket and IVORY stated, "I forgot about that."

7 51. IVORY told investigators all the currency he possessed belonged to him.

8 52. When asked why the currency was separated into different bundles,
9 IVORY stated he did not want to carry one large bundle in his pocket so he separated it.

10 53. IVORY stated he had a clothing business called Pimperelli, but did not
11 know the business address or phone number.

12 54. A check of the Texas Office of the Comptroller and other databases
13 revealed Pimperelli, LLC, was registered to Effani Alexander since December 17, 2016.

14 55. No other registered agents were listed for Pimperelli, LLC.

15 56. IVORY claimed they sold clothing via an Instagram account @pimperelli
16 or www.pimperelli.com.

17 57. IVORY stated he started the business with "his boys" two or three years
18 ago.

19 58. IVORY added that he was part of "LACEDFAMTX," a group he "RAPS
20 and PROMOTES" music with.

21 59. Investigators again asked IVORY how much currency he was carrying and
22 he replied, "Honestly, I didn't count it before I left."

23 60. IVORY stated he knew his larger bundle consisted of \$5,000 and the
24 smaller bundles were \$1,000 or \$2,000.

25 61. IVORY could not explain why the bundles were separated into those
26 specific amounts.

27 62. IVORY told investigators he did not have a bank account because he used
28 his mother's account.

1 63. IVORY had a Texas identification card rubber-banded to one of the
2 currency bundles in his pocket.

3 64. Investigators asked IVORY how he obtained the currency. IVORY stated
4 he saved up \$12,000, his mother gifted him with \$5,000, and \$3,000 belonged to his
5 friend "TJ."

6 65. IVORY did not know the last name or phone number of his friend TJ.

7 66. IVORY claimed TJ wanted "Yeezy" Shoes, designer Adidas tennis shoes
8 by Kanye West, and they were not sold in Houston.

9 67. Investigators asked IVORY how he got paid for his clothing line if he did
10 not have a bank account or an online payment system like PayPal or Apple Pay. IVORY
11 stated he did "hand to hand sales" in the Houston area and "his boy" handled the
12 shipping.

13 68. Investigators asked who actually owned Pimperelli. IVORY stated
14 "Probably one of my other boys."

15 69. When asked the specific name of "his boys," IVORY stated "Effani."

16 70. When asked what Effani's last name was, IVORY did not know.

17 71. IVORY claimed the currency he had was "business money" obtained to
18 purchase more merchandise in the garment district of Los Angeles.

19 72. When asked if the currency belonged to him (IVORY) or belonged to
20 Effani, the business owner, IVORY stated it all belonged to him except the \$3,000,
21 which TJ gave him.

22 73. Investigators explained to IVORY they were trying to verify how he
23 obtained the currency and it was strange he was in business with several people, but did
24 not know their last names or contact numbers.

25 74. Investigators asked IVORY if he filed taxes and he initially stated "Yes,"
26 but then admitted Efanni actually filed taxes for Pimperelli.

27 75. IVORY claimed he gave "his boy" cash for Pimperelli merchandise and he
28 (IVORY) sets a price and sells it himself.

1 76. IVORY stated he had been selling merchandise since the business was
2 established and has earned over \$30,000.

3 77. IVORY told investigators he had never personally filed taxes.

4 78. IVORY stated he did not have a hotel reservation and could not rent a
5 vehicle in Los Angeles because he did not have a driver's license.

6 79. IVORY claimed when he arrived, he would just start calling friends
7 unexpectedly until someone was available to pick him up from LAX.

8 80. IVORY told investigators he had several friends from Houston already in
9 Los Angeles and he would just stay where they were staying, or get a hotel room.

10 81. IVORY could not tell investigators a specific area of Los Angeles he
11 planned to stay or shop, but claimed his friends would drive him anywhere he needed to
12 go.

13 82. IVORY later claimed his Houston-based friend "Mya Papaya" was visiting
14 her friends in North Hollywood and he would just call her and stay at her friend's
15 apartment unannounced.

16 83. IVORY stated he needed a lot of cash because California is expensive and
17 he had girls and parties to spend money on.

18 84. When asked why he did not keep the currency in the bank until he needed
19 it, IVORY stated he did not have a personal bank account and did not have access to the
20 business account.

21 85. IVORY said he worked with Effani and is paid in cash.

22 86. IVORY said he "stashes" his money at his house and his mother also saves
23 money for him.

24 87. Investigators asked IVORY if he withdrew the currency he was traveling
25 with from the bank. IVORY stated they have their own money and stash it at the house,
26 and they do not deposit all the cash into his mother's bank account.

1 88. IVORY stated his mother is a massage therapist.

2 89. IVORY had one carry-on bag, and gave consent for his carry-on bag to be
3 searched.

4 90. During the search, several bundles of currency wrapped with rubber-bands
5 were identified inside.

6 **Canine Examination**

7 91. Raven is a two-year old black Labrador Retriever, trained and certified to
8 detect the odors of marijuana, cocaine, heroin, and methamphetamine.

9 92. Raven is currently certified with the National Police Canine Association
10 and last certified on January 23, 2017. Raven has been in service since November 2016.
11 If at any time during the examination Raven smells one of the odors she is trained to
12 detect, Raven will alert with an active alert at the area she smells the odor in and/or on.
13 Detective Rodriguez is Raven's only handler. The search was conducted in the CNIU
14 office area.

15 93. Prior to using Raven to conduct a sniff of the currency, Detective
16 Rodriguez had Raven inspect and sniff the area in which the currency was to be placed.

17 94. During the initial inspection, Raven did not alert to any of the four odors
18 she is trained to detect. Raven was then taken out of the room, taken to a different room
19 and placed back in her kennel while investigators cleared the room.

20 95. Detective Blaylock and SA Derryberry then placed the currency found
21 during the investigation, \$18,080 in U.S. currency, in a table drawer inside the
22 supervisor office that Raven had previously inspected.

23 96. Raven was then removed from her kennel and brought back into the
24 examination room.

25 97. Detective Rodriguez gave Raven the command to conduct an inspection of
26 the area in which the \$18,080 in U.S. currency had been placed.

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1 98. Raven began searching the items within the office and when she began
2 searching the table drawer where the currency was placed, her tail began to wag at a
3 rapid pace, her breathing increased, and she began to scratch at the drawer.

4 99. Detective Rodriguez recognized this behavior as a positive alert indicating
5 Raven could smell one or more of the four odors she is trained to detect.

6 **IVORY's Continued Interview**

7 100. Detective Rodriguez advised IVORY his narcotic canine gave a positive
8 alert on the currency.

9 101. IVORY stated he had not smoked marijuana in several months, then
10 admitted he was recently put back on probation for failing a urine analysis.

11 102. IVORY claimed to not know his probation officer's full name or phone
12 number, only stating her name was "Ms. Gregor or something like that."

13 103. IVORY stated other people around him smoke marijuana, including his
14 mother.

15 104. Investigators asked IVORY again what the total amount of the currency he
16 was traveling with was. IVORY stated \$12,000 belonged to him and he was certain of
17 the amount because he counted it before leaving Houston.

18 105. IVORY stated his mother gave him \$5,000, but he did not count it and TJ
19 gave him \$3,000. IVORY then stated he should have between \$17,000 and \$18,000.

20 106. During the interview, IVORY gave several conflicting stories regarding
21 the amount of U.S. currency he was traveling with, the purpose of travel, to whom the
22 U.S. currency belonged, where the U.S. currency came from and what the U.S. currency
23 was to be used for.

24 107. IVORY denied investigators consent to view the contents of his cell phone
25 after they explained they wanted to look through his texts and pictures for drug sale
26 activity, which could implicate or exculpate him.

27 108. A check of IVORY's cellular number XXX-XXX-9634 showed it is linked
28 to the Facebook page "You Kno'It" Patrick Ivory.

1 109. A picture of IVORY with a large amount of \$100 bills was posted on the
2 page.

3 110. Investigators verified a total amount of \$18,080 in U.S. currency.

4 111. Investigators advised IVORY the currency would be impounded pending
5 an investigation.

6 112. The \$18,080.00 in United States currency was seized on September 19,
7 2017.

8 **The J'Mulan Agency**

9 113. On September 20, 2017, CNIU received an email from Jaleks Holman of
10 The J'Mulan Agency, claiming IVORY is a full-time employee working as an event
11 coordinator.

12 114. IVORY never mentioned his employment with The J'Mulan Agency
13 during his contact with investigators.

14 115. Holman attached two paychecks listing IVORY's purported earnings, but
15 the checks appeared to have been fabricated.

16 116. Research of The J'Mulan Agency revealed there was no tax identification
17 number.

18 117. Research also revealed there were no business affiliations discovered for
19 Jaleska Holman.

20 118. When investigators searched the address printed on the pay stub for
21 J'Mulan Agency, 6009 Richmond Ave., Houston TX 77057, the J'Mulan Agency could
22 not be found.

23 119. The address 6009 Richmond Ave., Houston TX 77057, was a large
24 building with a couple of businesses.

25 120. Investigators could not find J'Mulan and asked the current tenants. The
26 current tenants had never heard of J'Mulan.

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121. The second address listed on the pay stub for J'Mulan Agency was 8795 Antoine Dr. #107, Houston TX 77057. Investigators visited this address which was occupied by "Barber School Student Barbers," but no J'Mulan was found or known.

Claim filed by IVORY

122. On or about November 2, 2017, the United States Customs and Border Protection received a claim, dated October 30, 2017, from IVORY along with a cover letter from attorney Jennifer R. Grant, claiming IVORY was the legal and rightful owner of the \$18,080 in U.S. currency.

IVORY's Criminal History

123. IVORY has been arrested and/or charged with multiple offenses, including burglary, evading arrest, possession of marijuana and tampering/fabricating evidence. On or about July 22, 2015, IVORY was arrested by the Houston Police Department for Possession of Marijuana, 2 oz., was convicted on October 13, 2015, and was sentenced and fined.

124. On or about November 29, 2015, IVORY was arrested by the Houston Police Department in Texas for Tampering/Fabricating Physical Evidence and Possession of Marijuana 2 oz. IVORY was convicted on March 4, 2016, for Possession of Marijuana 2 oz., and sentenced and fined.

125. On or about November 6, 2016, IVORY was arrested by the Hempstead Police Department in Texas for Possession of Marijuana, 2 oz.

Wage and Employment Investigation

126. Investigators ran a query of IVORY's employment history. Texas employment database showed no record of employment history for IVORY.

IVORY's Flights to Los Angeles, CA

127. On July 27, 2017, IVORY flew from Los Angeles to Houston on flight #6038, a direct flight.

128. On August 25, 2017, IVORY flew from Houston to Los Angeles on flight #6064, a direct flight.

129. On September 28, 2017, IVORY flew from Houston on flight #531 to Los Angeles with a stop in Phoenix, AZ.

130. On September 19, 2017 (day after interdiction at Phoenix), IVORY flew on a return flight from Los Angeles to Houston on flight #6038.

131. During his interview on September 18, 2017, IVORY stated he was traveling to Los Angeles to go shopping, visit some friends for a couple days and to celebrate his birthday on September 22, 2017.

132. However, from the time IVORY landed in Los Angeles on September 18, 2017, at 3:34 p.m. to the time he departed Los Angeles on September 19, 2017, IVORY was in Los Angeles a total of 27 hours and 6 minutes, contradicting IVORY's statement regarding the purpose and scheduled time of his travel.

Demand/Source Relationship

133. A demand/source relationship exists between Houston, Texas, and southwest states relating to the distribution of illegal drugs. Drug money couriers commonly travel from the states such as Texas to Arizona and California for the purpose of transporting currency intended to be used to purchase illicit drugs. Due to its close proximity to the U.S./Mexico border, Phoenix and Los Angeles are supply locations for the distribution of illegal drugs throughout the United States.

Seizure of Currency

134. The following represents a breakdown of the \$18,080 in U.S. currency carried by IVORY:

<u>Number of Bills</u>	<u>Denomination</u>	<u>Amount</u>
65	\$ 100.00	\$ 6,500.00
4	\$ 50.00	\$ 200.00
540	\$ 20.00	\$ 10,800.00
58	\$ 10.00	\$ 580.00
Total:		\$ 18,080.00

1 135. Twenty dollar bills are the most common denomination of currency used
2 by drug traffickers and those who launder the proceeds of drug trafficking.

3 136. Moreover, the defendant currency was bundled in a manner that is similar
4 to how drug traffickers routinely bundle their drug proceeds.

5 **FIRST CLAIM FOR RELIEF**

6 The defendant currency was furnished or intended to be furnished by a person in
7 exchange for a controlled substance or listed chemical in violation of Title II of the
8 Controlled Substances Act, 21 U.S.C. § 801 *et seq.*, constitutes proceeds traceable to such
9 an exchange, or was used or intended to be used to facilitate a violation of Title II of the
10 Controlled Substances Act, 21 U.S.C. § 801 *et seq.*, or is property involved in a money
11 laundering transaction or attempted transaction and therefore subject to forfeiture to the
12 United States pursuant to 18 U.S.C. § 981(a)(1)(A) and 21 U.S.C. § 881(a)(6).

13 **SECOND CLAIM FOR RELIEF**

14 The defendant currency constitutes or is derived from proceeds traceable to a
15 violation of, among other things, a specified unlawful activity and travel in interstate
16 commerce to distribute the proceeds of, and promote or facilitated the promotion of, an
17 unlawful activity and therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

18 WHEREFORE, the United States of America prays that process of warrant *in*
19 *rem* issue for the arrest of the defendant currency; that due notice be given to all parties
20 to appear and show cause why the forfeiture should not be decreed; that judgment be
21 entered declaring the defendant currency be forfeited to the United States of America for

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1 disposition according to law; and that the United States of America be granted such
2 other and further relief as this Court deems just and proper, together with the costs and
3 disbursements of this action.

4 DATED this 24th day of January, 2018.

5 ELIZABETH A. STRANGE
6 First Assistant United States Attorney
7 District of Arizona

8 S/ Mark J. Wenker
9 MARK J. WENKER
10 Assistant United States Attorney
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VERIFICATION

I, Brian Derryberry, verify and declare under penalty of perjury that, I am a Special Agent with the United States Homeland Investigations, that I have read the foregoing Complaint for Forfeiture *In Rem* and know the contents, and that the matters contained in the Complaint are true to my own knowledge, except that those matters alleged upon information and belief and as to those matters, I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case.

I verify and declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of January, 2018.



Brian Derryberry, Special Agent
United States Homeland Investigations

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the District of Arizona.

The completed cover sheet must be printed directly to PDF and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff **United States of America**
(s):

County of Residence: Maricopa

County Where Claim For Relief Arose: Maricopa

Defendant \$18,080.00 in United States
(s): **Currency**

County of Residence: Maricopa

Plaintiff's Atty(s):

**Mark J. Wenker , Assistant United States
Attorney
United States Attorney's Office
40 N Central Ave., Ste. 1800
Phoenix, Arizona 85004-4408
602-514-7500**

Defendant's Atty(s):

II. Basis of Jurisdiction: **1. U.S. Government Plaintiff**

III. Citizenship of Principal
Parties (Diversity Cases Only)

Plaintiff:- N/A

Defendant:- N/A

IV. Origin : **1. Original Proceeding**

V. Nature of Suit: **625 Drug Related Seizure of Property 21 USC 881**

VI.Cause of Action: **Forfeiture of property to the U.S. pursuant to 21 U.S.C. § 881(a)
(6), 18 U.S.C. § 981(a)(1)(A), and 18 U.S.C. § 981(a)(1)(C).**

VII. Requested in Complaint

Class Action: No

Dollar Demand: **\$18,080.00**

Jury Demand: **No**

VIII. This case is not related to another case.

Signature: **S/ Mark J. Wenker**

Date: **01/24/2018**

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, save this form as a PDF and include it as an attachment to your case opening documents.

Revised: 01/2014